

TO: CITY OF SUMNER PLANNING DEPARTMENT
FROM: ROSS WIDENER, WIDENER AND ASSOCIATES
SUBJECT: SALMON SPRINGS TRANSMISSION MAIN PROJECT
DATE: FEBRUARY 19, 2016

On behalf of the City of Puyallup, this memorandum is in response to several comments made by the City of Sumner Planning Department on January 29, 2016 in regards to reevaluation of the SEPA MDNS issued December 10, 2015 and amended January 26, 2016. A supplemental SEPA checklist (with changes shown in red) and an updated habitat management plan are attached that address these comments. The following are itemized responses to each comment:

- 1) *"After further review of the City's stream and wetland buffer regulations, staff has determined that the proposal is considered utility corridor work and, therefore, does not require a variance (per SMC 16.46.150(J)(2) and SMC 16.56.100(G)(2)), provided that the project includes adequate buffer restoration/enhancement."*

The SEPA checklist has been amended to show that no Variance will be required. The habitat management plan has been updated to describe the restoration of all temporarily-impacted buffer and preservation of 86,730 sq. ft. (1.99 acre) of Salmon Creek buffer upstream of the project area.

- 2) *"The project has increased in scope and area of buffer impact over what was included in the SEPA review. Given the added bridge piers, additional fill, increased clear/grade area, and potential additional staging area, the City intends to re-issue the SEPA MDNS with notice of the decision to agencies. The applicant will first need to update the submittal (as noted below) to clarify the scope of work."*

While the temporary bridge was not shown on the plans submitted with the original SEPA application, permanent buffer impacts and fill/grading associated with the bridge were included in the permanent buffer impacts presented in the SEPA checklist and habitat management plan. The plans included with the SEPA checklist and habitat management plan (attached) show the plan and profile views of the bridge. While the anchor blocks will be permanent to avoid future impacts to the stream banks, the decking will be temporary in nature and will only be utilized for future maintenance or emergency access after the proposed project is complete.

The proposed laydown area is also included in the supplemental SEPA checklist. This area has been located completely outside of the regulated 100-foot buffer of Salmon Creek to avoid any additional buffer impacts. As this staging area is within 1,000 feet of Salmon Creek, the habitat management plan has been updated accordingly.

- 3) *“Provide a vicinity and site plan of any proposed staging/lay down areas. Show any adjacent wetland or stream buffers.”*

Please refer to Figure 3 of the attached supplemental SEPA checklist and updated habitat management plan.

- 4) *“The extent of tree removal appears to be greater than what project documents show. There are a number of trees located within and adjacent to the clear/grade area that are identified as “protected” trees. Where the drip line of these trees falls within the clear/grade area, show the diameter of the tree, and describe measures used to limit impacts to the roots. If trees cannot be adequately protected, please show these as removed, and revise the tree replacement quantities for the project.”*

The number of trees that will be felled has been reduced to 5 after consultation with the Washington Department of Fish and Wildlife (WDFW). The Hydraulic Project Approval (HPA) issued by WDFW on February 16, 2016 references submitted plans that only show the 5 trees being felled. While there will be additional trees within the clearing limits that will be protected, none of these trees are within the limits of the 4-foot wide trenching for the proposed transmission main. Cutting of roots, especially structural roots over 4 inches in diameter, will be minimized to the maximum extent practicable. Any roots that cannot be avoided will be cut with sharp tools to encourage good wound closure and confine the spread of decay. If any tree whose roots are impacted by the proposed trenching falls or dies as a result of construction or during the monitoring period, a review will be conducted with the City of Sumner and any applicable resource agencies to determine the appropriate course of action, including the relocation of the damaged tree and/or replanting. In addition, a portion of the Salmon Creek buffer that will be purchased as mitigation for permanent buffer impacts will be forested.

- 5) *“Please revise pages 2 and 3 of the SEPA checklist:*
a. For the date checklist prepared, add to the June 10th date, the date it was amended; state that the Critical Area Variance is not required.”

Please refer to page 2 of the attached supplemental SEPA checklist.

“b. Revise the proposal description to clarify the revised scope of the project (including noting a vehicular bridge with permanent piers, what features are temporary/permanent, total area grade/fill, total area proposed for mitigation, revised tree and shrub replacement numbers, etc.). Please show these changes as “Track Changes” or legislative changes, so that agencies and other reviewers can clearly see the project revisions.”

Please refer to the revised proposal description in the attached supplemental SEPA checklist as well as the attached updated habitat management plan. Changes to the scope of the project are indicated in red on the supplemental SEPA checklist.